

CRIMINAL COMPLAINT (Electronically Submitted)

United States District Court United States of America V. Angelica Vargas DOB: 1987; United States Citizen DISTRICT of ARIZONA DOCKET NO. MAGISTRATE'S CASE NO. 23 *0 3 1 9 7 M J

Complaint for violation of Title 18, United States Code, § 554(a)

On or about February 3, 2023, in the District of Arizona, Angelica VARGAS knowingly and fraudulently exported and sent from the United States, and attempted to export and send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, and received, concealed, bought, sold, and in any manner facilitated the transportation, concealment, and sale of such merchandise, article or object, that is: one (1) complete Ruger LC9 firearm and two (2) Ruger 9mm magazines, knowing the same to be intended for exportation contrary to any law or regulation of the United States, to wit: Title 50, United States Code, Section 4819; Title 15, Code of Federal Regulations, Parts 736.2, 738, and 774; all in violation of Title 18, United States Code, Section 554(a).

BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:

On February 3, 2023, Angelica VARGAS attempted to exit the United States and enter the Republic of Mexico through the DeConcini Port of Entry in Nogales, Arizona. Customs and Border Protection Officers (CBPOs) were conducting outbound inspections when they stopped a gray 2004 Hyundai Sonata driven by sole occupant and registered owner Angelica VARGAS. The CBPO asked VARGAS if she had any currency over \$10,000, weapons, or ammunition to declare to which she denied having any of these items. During an inspection of the vehicle, CBPOs discovered two (2) Ruger 9mm magazines concealed under the radio/dashboard area. A subsequent search of the vehicle yielded the discovery of one (1) Ruger handgun frame and one (1) Ruger handgun slide. The Ruger frame was wrapped in a blue towel and concealed under the rear seat, and the Ruger slide was concealed under the radio/dashboard area. A CBPO approached VARGAS to conduct a pat-down search and asked her if she had anything on her body that could poke or hurt the CBPO. VARGAS immediately stated, "I have a part of what you found, inside of me, and that's all I'm going to say; they're making me do this." During the pat-down search, the CBPO felt a hard object in VARGAS' groin area. VARGAS voluntarily removed the barrel of a gun from her groin area. The CBPOs were able to assemble a complete Ruger LC9 firearm. In total, CBPOs seized one (1) complete Ruger LC9 firearm and two (2) Ruger 9mm magazines.

(BASIS OF COMPLAINT CONTINUED ON REVERSE.) MATERIAL WITNESSES IN RELATION TO THE CHARGE: N/A **DETENTION REQUESTED** SIGNATURE OF COMPLAINANT Being duly sworn, I declare that the foregoing is **GUILLERMO A** Digitally signed by GUILLERMO A CARRERA true and correct to the best of my knowledge. CARRERA Date: 2023.09.18 16:48:50 -07'00' Reguel Caethano Dighally signed by MAQUEL AMELIANO Date: 2023.09.18 14:10:53-07:00 OFFICIAL TITLE AUTHORIZED BY AUSA R. Arellano HSI Task Force Officer G. Anthony Carrera Sworn by telephone x SIGNATURE OF MAGISTRATE JUDGE1) DATE September 18, 2023 See Federal Rules of Criminal Procedure Rules 3, 4.1, and

Case 4:23-cr-02116-JCH-AMM Document 1 Filed 09/18/23 Page 2 of 2 3 1 9 7 N J (BASIS OF COMPLAINANT'S ALLEGATION AGAINST THE ACCUSED CONTINUED.)

The complete Ruger LC9 firearm and magazines found in the vehicle and on VARGAS qualify as United States Commerce Control List items and therefore are prohibited by law for export from the United States into Mexico without a valid license. VARGAS does not possess a license to export firearms, firearm parts or magazines into Mexico.



